

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

CHELSEY GOSSE, <i>on her own behalf</i>)	Case No. 3:20-cv-01446
<i>and on behalf of other persons similarly</i>)	
<i>situated,</i>)	
)	RDM Hon. Robert D. Mariani
Plaintiff,)	
)	
v.)	Electronically Filed
)	
TRANSWORLD SYSTEMS, INC.;)	
U.S. BANK, NA.; RATCHFORD LAW)	
GROUP, P.C.; NATIONAL)	
COLLEGIATE STUDENT LOAN)	
TRUST 2007-3,)	
)	
Defendants.)	

MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT

NOW COMES defendant, Ratchford Law Group, P.C. (RLG), and moves the Court to extend the time for RLG to answer, move or otherwise plead in response to the Complaint. In support of this Motion, RLG avers as follows:

1. RLG's responsive pleading are presently due on or before October 26, 2020.
2. RLG is engaged in ongoing discussions with its codefendants regarding defense and indemnity issues and requires additional time to resolve these issues, investigate the claims and retain counsel.
3. In addition, co-defendants U.S. Bank, N.A. and Transworld Systems Inc. have filed motions to strike certain claims and/or allegations in the Complaint. Doc. ## ___. Because the outcome of those motions may moot or alter the material allegations and issues in dispute, RLG requests its deadline to respond to the Complaint be extended until

such time as the Court has ruled on the motion to strike. Specifically, RGS purposes and requests that it be permitted to answer or otherwise plead in response to the Complaint within 14 days after the Court's action on the pending motion to strike.

A motion to strike alters the deadline to file responsive pleadings. Pursuant to Fed. R. Civ. P. 12(a)(4)(A), if the Court denies the motion or postpones its disposition until trial, responsive pleadings must be served within 14 days after notice of the court's action, unless otherwise set. The Court's ruling on the pending motion to strike could necessitate the filing of an amended complaint or may otherwise materially affect the allegations that require a response. For the sake of efficiency and to avoid confusion, RLG's deadline to file responsive pleadings should mirror the moving defendants' responsive pleadings deadline.

There is no prejudice to the Plaintiffs or other parties if the requested relief is granted, as the pleadings will not be closed until after the Court rules on the pending motion(s) to strike, and then not until the defendants presently moving to strike answer or otherwise plead.

4. No other extensions of time have been sought by RLG.

5. RLG has requested counsel for plaintiff consent to the Motion but at the time of filing has not received a response.

Date: October 26, 2020~~October 23, 2020~~ Respectfully submitted,

CERTIFICATE OF SERVICE

I certify that on October 26, 2020~~October 23, 2020~~, a copy of the foregoing was filed electronically in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system

Attorney